

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
THE CITY OF EDINBURGH COUNCIL	:	
ON BEHALF OF THE LOTHIAN	:	
PENSION FUND, On Behalf of Itself and	:	
All Others Similarly Situated,	:	
	:	
Plaintiff,	:	Civil. Action No. 07 Civ. 9921 (PKC)
v.	:	
	:	
VODAFONE GROUP PUBLIC LIMITED	:	
COMPANY, et al.,	:	
	:	
Defendants.	:	
-----X		

**DEFENDANTS' NOTICE OF MOTION TO DISMISS THE AMENDED
COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the Declaration of Jordan T. Razza (executed on June 6, 2008) and Exhibits A-J thereto, and the other submissions and arguments of Defendants, Defendants Vodafone Group Plc, Andrew N. Halford, Kenneth J. Hydon, Lord Ian MacLaurin of Knebworth and Arun Sarin, by and through their counsel, respectfully move this Court, pursuant to Rules 9(b), 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b)(3)(A), in Courtroom 12C, in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on August 6, 2008, at 10:00 o'clock in the morning, or at such other time and place as counsel may be heard at the convenience of the Court, for an order dismissing the Amended Complaint in its entirety, on the merits and with prejudice as to all Defendants and for such other and further relief as the Court may deem just and proper.

DATED: New York, New York
June 6, 2008

Respectfully submitted,

SULLIVAN & CROMWELL LLP

By: /s/ Gandolfo V. DiBlasi
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